

Appendix 5: OPPTS Response to Comments on the Draft 2008 NPM Guidance

Commenter	Reporting Requirement	Comment(s)	Response to Comment(s)
New England States	Reduce Chemical Risks 4.1.1 Mercury	<p>Air Pollution including Interstate Transport and Mercury Priority Comments Mercury: EPA should move forward with implementation of its National Road Map for Mercury. In addition, the states need EPA funding and support for a comprehensive water and fish-tissue monitoring network for mercury, which should come from new sources rather than a redirection of existing sources such as 106 funds or other primary state sources. Further, mercury should be explicitly mentioned in EPA's NPM guidance, whereas it currently is not mentioned or only cursorily mentioned by OSWER, OPEI, OECA and OPPTS. Lastly, EPA should work closely with the New England states on establishing an innovative approach to Total Maximum Daily Loads (TMDLs) for mercury-impaired waters.</p> <p>Reduced Federal Funding for State Environmental Programs In addition to the thematic priority comments above, we must raise the critically important issue of reduced federal funding for state environmental programs. Nationally, EPA's State and Tribal Assistance Grant (STAG) Funds provide about 30% of state environmental agency budgets. For each of the last three years, EPA has cut STAG funds, and this year the President's budget proposes the largest STAG cuts in history. These cuts threaten to undermine the New England states' ability to provide the environmental protection mandated by Congress and these cuts severely limit the states' ability to make progress in our shared priority areas. In addition to concern about reduced federal funding, the New England states continue to need maximum flexibility from EPA in how the states use federal funding including funding included in our Performance Partnership Grants (PPGs).</p> <p>Program Office – Office of Prevention, Pesticides, and Toxic Substances (OPPTS): OPPTS states that it “has no Strategic Targets addressing mercury. OPPTS will work to reduce mercury as a threat to human health and</p>	<p>OPPT is moving forward with its commitments in the Roadmap.</p> <p>Mercury is a cross cutting issue within EPA. Several of the comments mentioned are not within the scope of OPPTS. (such as the Hg Water issues)</p> <p>We are working to foster collaborative efforts to address mercury across the agency.</p> <p>While funds have been declining over the past years, NPM is not the format for this discussion. However, in the FY 2009 Annual Planning & Budget Process concerns regarding STAG money and flexibility with PPG spending have been raised.</p> <p>OPPT is moving forward with commitments identified in the Mercury Roadmap, and agree that implementation of this roadmap is paramount to achieving environmental improvement.</p>

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		<p>the environment through the implementation of EPA’s Roadmap for Mercury.” However, there is no implementation plan for the Roadmap. The New England states fully support the national roadmap, however the states collectively feel that moving forward with implementation is critical. Recommendations:</p> <ol style="list-style-type: none"> 1) Support state programs/legislation addressing mercury in products, including IMERC. 2) Expand national initiatives to capture and recycle mercury-added products focusing on major contributors to mercury in the solid waste stream. 3) Facilitate capacity-building and information sharing among the states and between the states and national/international forums. 4) Develop and implement strategy for long-term storage/retirement of excess elemental mercury. 	<p>Mercury is a cross- cutting issue within EPA, NPMs, and states, tribes, and territories. OPPTS will continue to work with other NPMs to identify areas where collaboration would be beneficial in response to identified comments.</p>
Region 3	Reduce Chemical Risks 4.1.1 Lead (ACS Measures 11A,11B, 13A, 13B, 12, and 21)	<p>The proposed combination of approaches that offer the most promise for an effective national program identifies the need for EPA to coordinate with CDC, HUD and DOJ, but there aren’t clear expectations on how this will be accomplished. The statement is nebulous. In order to achieve quantitative results, there must be a strategic plan that defines each Federal Agency's activities that will contribute to meeting the 2010 goal.</p> <p>Under Toxics Programs Priorities on Page 7 Background, the regional measures are reporting measures only and don't have any significance with regards to achieving environmental benefits. However, its important to have an authorized program, accredited training providers and certified professional, but the measures should be results oriented. For example, we should be tracking information from cradle to grave, an EBL child, ordered abatements using certified contractor, HUD assistance back to a lead safe home. This information may be possible to collect via state, local, CDC, HUD and EPA working together to gather this information.</p> <p>Proposed Principal Activities for the Regions - Is this activity below for targeted grants or is HQs expecting the Regions to implement this</p>	<p>The program agrees that national coordination is an effective tool and that is why it has been highlighted in guidance. We will continue to explore opportunities to link Strategic plans, targets, and efforts among the primary federal partner agencies.</p> <p>At this point the program is comfortable with the measures that have been developed, but will continue to look for ways to better measure the environmental benefits of the program’s activities and encourage discussions to improve future performance measures.</p> <p>While this does refer to the targeted grants, the program expects that any other Regional education and outreach activities will target areas</p>

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		<p>activity.</p> <p>Implement lead-based paint risk reduction education, outreach and regulatory implementation programs in target areas with high concentrations of children with elevated blood levels. Please clarify.</p> <p>Summary: There is a need to develop a workgroup challenged to come up with better measures to reflect the work that all entities are involved in meeting the 2010 goal. During the EPA, CDC and HUD Grantees Conference in Florida 4 years ago, the Plenary speaker spoke about how all the appropriate parties and players in his state got together and wrote a strategic plan. He said other pertinent things, but the point Region 3 is making is, we need to do the same in order to have real results that makes a difference.</p>	<p>with high concentrations of children with elevated blood levels.</p> <p>Headquarters will continue to pursue opportunities for coordination and collaboration with the other Federal partners and encourage discussions to improve performance measures.</p>
Region 5	<p>Reduce Chemical Risks 4.1.1</p> <p>Reduce Chemical Risks 4.1.1 Lead (ACS Measures 11A, 11B, 13A, 13B, 12, and 21)</p>	<p>Although PCBs are no longer a priority, there will still be some non-remediation or disposal/storage permitting work (the work transitioning to OSWER) on PCBs, such as PCB phase-out. Just to clarify, even though PCB phase-out is part of the international agreement, Stockholm Convention, by its complete absence in this guidance, it looks like it is no longer a priority for OPPTS.</p> <p>Page 1, Toxic Program Highlights Section, Lead Subsection, Approach #4; and Page 6, Toxic Program Priorities Section, Lead Subsection, Long-Term Strategy <u>Comment</u> Region 5 strongly agrees with this approach and included it as a priority in recommendations for accelerating to meet the lead elimination goal (leapfrog). We intend to pursue this approach, but are, again, encouraging Headquarters participation in this approach as well.</p> <p>Page 6, Toxic Program Priorities Section, Lead Subsection, Bullets under the Strategic Plan Targets; and Page 7, Toxic</p>	<p>After the transition of the PCB cleanup and disposal program to OSWER, OPPT will continue to administer PCB use and manufacturing issues. Additionally, OPPT will continue to handle the open burning issue at Army ammunition plants. OPPT is considering the development of a PCB Use Strategy to address issues related to the current PCB use authorizations, which may include phase out of certain PCB uses and a reexamination of inadvertently generated PCBs. If OPPT decides to move forward on a PCB Use Strategy, the Regions will be consulted for input.</p> <p>Headquarters agrees and will continue to pursue opportunities for coordination and collaboration with the other Federal partners.</p>

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		<p>Program Priorities Section, Lead Subsection, First Paragraph under the Background Subsection</p> <p><u>Comment 1</u> Although the target is to eliminate childhood lead poisoning as a public health concern by 2010 by reducing to 0 the number of children with elevated blood lead levels, EPA should begin to prepare itself for the fact that this target will not be met. Although the 3rd bullet (target) under the Strategic Plan Targets may be met, the 2nd target won't. Thus, the target year for the 2nd bullet should be changed.</p> <p><u>Comment 2</u> Comment 1 above also applies to the language referring to "...commitment to eliminate childhood lead poisoning as a public health concern by 2010" in the first paragraph under the Background subsection. Region 5 recently met with all of our states to discuss our Pb programs and steps needed to reach the 2010 strategy of eliminating childhood lead poisoning. No State thought we would reach that goal. One state, Michigan (Department of Community Health), stated in a letter to the Region that partnerships focused on developing programs are in their nascent stage and still need nourishment. Many state and local agencies are only now starting to reach effectiveness in implementing federal, state, and local programs. In addition, there is a tremendous variation in screening rates and state laws, etc. One of our own States, Indiana, doesn't even have the legislation to order abatements when a child is lead poisoned. When considering the variation in screening rates and the lack of children screened, simply using the CDC data on children with EBLs is not enough to conclude the 2010 goal has been met.</p> <p>Page 6, Toxic Program Priorities Section, Lead Subsection</p> <p><u>Comment</u> Include the Consumer Product Safety Commission (CPSC) in the sentence that reads, "OPPT will continue to coordinate with other federal agencies including, Centers for Disease Control (CDC), Housing and Urban Development (HUD), Department of Justice (DOJ), and with state, local and tribal governments to reduce or prevent risks to human health and the environment posed by lead-</p>	<p>An attempt to change the FY 08 national target was unsuccessful. Any changes to the Strategic Targets need to be proposed during the FY09 and FY10 budget development process.</p> <p>The program still believes, as does CDC and HUD, that the NHANES provides the best national perspective on the issue of childhood lead poisoning. There is no doubt however, that the screening data is extremely useful for State and even Regional planning purposes.</p> <p>OPPT made this editorial change and it was incorporated into the NPM Guidance.</p>

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	<p>Reduce Chemical Risks 4.1.1 Asbestos (ACS Measure 15)</p> <p>Pesticide Container/ Containment Regulations 4.1.3</p>	<p>based paint activities.”</p> <p>Page 12, Toxic Program Priorities Section, Asbestos Subsection Comments Fix the typo in the sentence that reads, “EPA’s asbestos program focuses primarily on implementing the Asbestos Hazard Emergency Response Act (AHERA), the Asbestos School Hazard Abatement Act (ASHAA), and the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) under the Clean Air Act.” “The Asbestos School Hazard Abatement Act (ASHAA)” should be changed to “the Asbestos School Hazard Abatement Reauthorization Act (ASHARA).” These are two distinct laws, with different mandates.</p> <p>Overall, we would like to suggest that the Asbestos Program move in a direction similar to the Lead Program by tracking changes in the number of reported cases of asbestos-related disease. In the same way that R5 is now reporting changes in its numbers of EBLL cases based on the national CDC data for the Select Regional Priorities (Midwest Eco-Region) Initiative, we could also start using national CDC data to track and report on any changes in the numbers of cases of mesothelioma and asbestosis. CDC is currently compiling national statistics for both of these indicator diseases, but cannot report lung cancers attributable to asbestos-related causes. This would not be appropriate as an ACS commitment per se, but it would be a meaningful reporting measure that could be aggregated at the national level, and/or possibly dis-aggregated to the regional level. It would start to give us some sense (picture) of whether our asbestos risk management strategies are working.</p> <p>Implementation of the final Pesticide Container and Containment rule is an additional requirement and commitment for both the Regions and SLAs.</p> <p>Implementation of the rule is dependent on Headquarters providing the Regions and SLAs program guidance, training and outreach</p>	<p>OPPT made this editorial change and it was incorporated into the NPM Guidance.</p> <p>While we agree that ultimately the Asbestos Program, as with all programs, should strive for outcome measures, we are not in a position to introduce new measures at this stage in the NPM guidance. The opportunity exists to discuss new measurement ideas for the FY 09 NPM Guidance process.</p> <p>EPA Headquarters has already begun, or has plans to develop, the container-containment rule documents identified by Region 6, including program guidance, training and outreach materials, updated inspector training guidance, a compliance monitoring strategy and a policy that provides guidance on States carrying out an adequate program to ensure compliance with the residue removal requirements</p>

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Region 6	Pesticide Water Quality Program 4.1.4	<p>materials, and inspector training guidance.</p> <p>Reporting requirements for data such as in STORET should be kept a general goal and not be made a reporting measure for either the Regions or the States. It is more efficient if HQ searches this data.</p>	<p>in the rule.</p> <p>EPA's goal is to establish a process for the voluntary submission of State & Tribal surface and ground water quality data, including but not limited to Clean Water Act (CWA) §303(d) & §305(b) data, for consideration in exposure characterizations for ecological risk assessments and in risk management decisions for pesticide registration review.</p> <p>EPA asks Regions to try to identify State & Tribal CWA §303(d) and other water quality data that can be used in pesticide registration review assessments and to submit these data sets to EPA's Office of Pesticide Programs (OPP) early in the process to be considered in the reviews.</p> <p>OPP recognizes that raw data for all the parameters of interest may not be available in all monitoring studies, particularly for older studies, and that the types of water quality data collected might be different between monitoring programs. There is no need for States or Tribes to create or reformat any data – OPP will attempt to use what is available, either qualitatively or quantitatively.</p> <p>There are several options for providing the data or data locations to EPA/OPP:</p> <ol style="list-style-type: none"> 1. If the data are already in the new STORET database, then simply let OPP know where the dataset is located within the database. 2. If the data are in legacy versions of STORET, or in other data systems, then OPP would like to get the type of metadata and detailed data (contextual information) in cases such as: <ul style="list-style-type: none"> •If the supporting data were collected in a monitoring program conducted by the States themselves, OPP would like to receive the detailed monitoring data and a copy of any report describing the purpose and design of the monitoring study, or internet web address leading to this information. •If the data were collected by an outside party, such as university

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	Endangered Species Protection Program 4.1.4	<p>There is concern that OPP expects pesticide SLAs to request and gather additional WQ monitoring data from State environmental agencies. It would be more efficient if State environmental agencies had the reporting requirement under their grants.</p> <p>A projected timeline for the generation of the draft ESPP bulletins would be beneficial to both the Regions and the SLAs in order to plan resources accordingly.</p>	<p>researchers, then citations of published reports or copies of the reports themselves would provide the needed context. OPP does not wish to receive NAWQA data if it was used as the basis of a 303(d) listing or the identification of a water body of concern. Instead simply reference the specific NAWQA dataset.</p> <p>•If any 303(d) listings or other water quality concerns for pesticides were based on watershed characteristics or expected pesticide use, and not actual pesticide detections in surface water, such information could help inform OPP's risk assessment, as well.</p> <p>In summary, OPP is interested in seeing all available data for a specific water body of concern to a State or Tribe. If a monitoring study is already contained within the new STORET all that is required is its location within the database. For monitoring studies not contained with the new STORET, please submit data, or provide database locations, with associated documentation or references, as described above.</p> <p>OPP is not asking SLAs to ‘mine’ State water agency data for purposes of informing its risk assessments. It is suggesting that if they coordinate with the water agencies new information may come to light that could be of value in registration review. This information could also improve the basis for impairment listings due to pesticides, improve coordination of remediation activities, and support EPA strategic measures. Again, the expectation is that any <i>available</i> monitoring or other relevant data would be captured by the Region and forwarded to OPP.</p> <p>OPP will develop bulletins as we review a pesticide and determine that there are geographically specific use limitations that need to be in place to protect listed species. The schedule for when OPP will review pesticides for the next four years can be found at http://www.epa.gov/oppsrrd1/registration_review/schedule.htm . We are now reviewing carbofuran, aldicarb and nine rodenticide active ingredients on a national scale and, as a result of litigation, atrazine</p>

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		<p>R6 and SLAs will need additional technical and implementation guidance, particularly for inspectors. They will also need clarification from OECA on the level of specificity expected for inspection questions.</p> <p>It is strongly recommended that Headquarters improve its communication and coordination links with the US Fish & Wildlife Services, including the State Wildlife Agencies, since these offices manage wildlife resources on a daily basis, and are better suited to locating species that may be affected by pesticides. The Region does not have access to pesticide use pattern data, nor data on species locations.</p> <p>It is strongly recommended that the Region and SLAs have an</p>	<p>for several species in the midwest and southeast. While we haven't finished those assessments yet, those pesticides have the potential to require some mitigation on a geographic basis for endangered species protection.</p> <p>OPP has provided a PowerPoint presentation that can be used to introduce pesticide users to the ESPP. We are also completing a more lengthy, train-the-trainer presentation with speaker notes; fact sheets; and other materials. The OPP materials have information for inspectors and OECA has committed to providing guidance tailored specifically for inspectors.</p> <p>We acknowledge that interagency communications can always be improved, and OPP has been working to do so. Over the last several years, OPP has been in regular contact with both the U.S. Fish and Wildlife Service and the National Marine Fisheries Service regarding collaboration on pesticide risk assessments and endangered species. OPP also has worked to improve contacts with other appropriate agencies. When conducting species-specific risk assessments, OPP solicits data noted by R6 through several venues, including requests for public comment, contacts with various agencies, and personal communications with species and crop-data experts.</p> <p>If this comment refers to Proposed Principal Activity #3 (“When appropriate, Regions will coordinate comments from states and tribes on Bulletin development and review. This may include providing information to EPA headquarters on pesticide use patterns or species locations, reviewing draft maps for accuracy, and reviewing proposed pesticide use limitations for feasibility.”), OPP’s intent was not to expect the regions to have such information themselves; rather, OPP asks that regions help coordinate provision of that information to HQ when or if it is available from states or tribes.</p> <p>The risk assessment and bulletin development processes offer several</p>

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	Pesticide Container/Containment Regulations 4.1.3	<p>opportunity to review draft Bulletins, the web-site and additional objectives/activities that pertain to the ESPP.</p> <p>Implementation of the final Pesticide Container and Containment rule is an additional requirement and commitment for both the Regions and SLAs.</p> <p>Implementation of the rule is dependent on Headquarters providing the Regions and SLAs program guidance, training and outreach materials, and inspector training guidance.</p>	<p>opportunities for review and comment. When a bulletin is needed to address geographically specific use limitations to protect listed species, states and tribes will be specifically requested to review draft maps and pesticide use limitations that will be included in bulletins, and regions are requested to coordinate comments to HQ during these reviews. States and tribes may also be afforded another opportunity for review before finalization of use limitations and publication of a bulletin. Additionally, over the last several years, the regions, states, tribes and other federal agencies have provided invaluable input into developing the ESPP, in particular during several partners' workshops. The most recent of these was in November 2006, when OPP's regulatory partners helped develop educational and communications materials, Section 18 guidance and other facets of the ESPP. We expect this type of interaction to continue.</p> <p>EPA Headquarters has already begun, or has plans to develop, the container-containment rule documents identified by Region 6, including program guidance, training and outreach materials, updated inspector training guidance, a compliance monitoring strategy and a policy that provides guidance on States carrying out an adequate program to ensure compliance with the residue removal requirements in the rule.</p>
Region 8	Reduce Chemical Risks 4.1.1 Lead (ACS Measures 12 and 21)	<p><u>Lead Program</u> - Thank you for expanding on the definition of an outreach partnership. However the new language begs the questions: What is an "<i>on-going project</i>"? and What is a "<i>sustained</i> outreach and educational campaign"? (You'll recall that I asked last week during the conference call if a written procurement request to rent booth space at a home show in order to provide outreach material to the public would fit within what the NPM had in mind as an outreach partnership. If the answer to that question is now "no" because it's not <i>on-going</i> or <i>sustained</i> enough, I want to know that now so that we know what to count under this measure.)</p> <p>Also, we noticed that the "top tier" measures being discussed for this year included the modifier "Additional" in front of the FY2007 target stating the number of outreach partnerships. That sounds to us like a</p>	<p>The example of a one-time procurement request for a booth rental does not fit the definition of an outreach partnership.</p> <p>We agree that it may cause confusion and SBO had stated that the FY08 target language will be identical to the NPM Guidance national target language. This target is also consistent with the refined</p>

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	Reduce Chemical Risks 4.1.1 Mercury	<p><i>different</i> measure from the measure for ACS Code Measure 21, but it is similar enough to Measure 21 to create confusion. In other words, is Measure 21 supposed to be on-going in the same way as Measure 12, or does the modifier "Additional" in the "top tier" measures trump that and make Measure 21 essentially mean only the number of <u>new</u>, ongoing, sustained outreach partners should be counted? This could make a big difference in the number the Regions are willing to bid under this measure. Additionally, I would much prefer that the measures and definitions across the myriad reporting systems be the same so that our reporting burdens do not balloon even more out of proportion than they already are.</p> <p><u>Mercury Program</u> - Thank you for making the changes that you made in the long-term strategy and the proposed principal activities for regions. In addition to these changes, we would like to see more recognition of the concept of public education about reducing exposure to mercury in item 2 of the proposed principal activities for regions. Our only remaining concern is that mercury issues may not receive much attention at the regional level if measures are not expected or included. Because of this, we suggest inclusion of at least one mercury measure that is broad in scope, such as: Number of voluntary mercury partnerships aimed at reducing exposure to mercury and/or reducing mercury in the waste stream. This is broad enough that it could include health care, schools, non-profits, industry, and government.</p>	<p>definition of “partnerships.”</p> <p>OPPT is not in a position to introduce new measures at this stage of the NPM guidance process, but encourage discussions among Regions and HQ to develop appropriate measures for Mercury to be included in the FY 09 Guidance.</p>				
Region 9	Reduce Chemical Risks 4.1.1 Lead (ACS Measures 13A, 13B, and 21)	<p>In March 07 the regions conferenced to discuss comments and provide guidance to OPPT. There are some areas in the guidance for the Lead (Pb) Program that require clarification. OPPT agreed to revise the language and send it to the Regions for further comment.</p> <table><tr><th><u>Commitment</u></th><th><u>Comments</u></th></tr><tr><td>13A</td><td><i>Annual percentage of viable lead-based paint certification applications that require less than X days of EPA Regional effort to process.</i> HQ agreed to provide a value for "X" for the Regions to consider in their comments.</td></tr></table>	<u>Commitment</u>	<u>Comments</u>	13A	<i>Annual percentage of viable lead-based paint certification applications that require less than X days of EPA Regional effort to process.</i> HQ agreed to provide a value for "X" for the Regions to consider in their comments.	<p>OPPT responded to this comment, and it was incorporated into the NPM Guidance.</p>
<u>Commitment</u>	<u>Comments</u>						
13A	<i>Annual percentage of viable lead-based paint certification applications that require less than X days of EPA Regional effort to process.</i> HQ agreed to provide a value for "X" for the Regions to consider in their comments.						

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	Prevent Pollution and Promote Environmental Stewardship 5.2.1 P2 (ACS Measures 264,264A, 263, 262, 261A, and 261)	13B	<i>Annual percentage of viable lead-based paint certification applications that require less than grantee state-established timeframes to process.</i> We need a better definition of what a state-established timeframe should be. We also discussed putting in a number for the annual percentage and allowing regions to negotiate a challenging standard for the number of days individually with each state.	<p>A definition of grantee state established timeframe is included in Guidance, and we anticipate Regions negotiating targets with their individual authorized states/tribes based on local conditions.</p> <p>A refined definition of “partnerships” is included in the NPM Guidance. This definition is reflective of Regional comments.</p> <p>We realize this a dynamic process which will require continual refinement. OPPT will continue to collaborate with Regional partners.</p> <p>The P2 Measures Guidance will be issued and will include more specifically what results can and cannot be counted.</p>
		21	<i>Number of outreach partnerships addressing lead-based paint hazards and exposure reduction.</i> We need further clarification on what constitutes a partnership beyond situations where you have a grant, cooperative agreement or MOU.	
		We agree with the three focal areas; 1) Greening Supply and Demand, 2) Delivery of P2 Services, and, 3) P2 Infrastructure and with the four proposed principal activities of the regions: 1) Administer grants, 2) Promote regional multimedia coordination, 3) Federal Facility P2 implementation (as resources allow), and, 4) Provide direct P2 assistance to business (as resources allow). These foci and activities provide good general guidance and some specific examples without being too prescriptive. The Regions still have sufficient flexibility to engage in regional priority activities not mentioned in the guidance such as promoting Green building.		
Region 10	Reduce Chemical Risks 4.1.1 Lead (ACS Measures 11A, 11B, 13A, 13B, and 21)	For the Lead section, our comments on clarifying the definition of partnership have been addressed by the revision. We appreciate the rewritten definition and the clear examples of partnerships to address lead-paint based hazards and exposure reduction. This clarifies for the regions exactly what is meant by a documented partnership. Our only concern is that the number of partnerships nationwide almost doubles from 2007 to 2008. It increases from 40 to 70. It is difficult for the regions to increase partnerships each year and to sustain a high number. The 2008 number is possible; however increases beyond 70 may not be possible.		OPPT will address future lead partnership targets when further data are available.

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	Prevent Pollution and Promote Environmental Stewardship 5.2.1 P2 (ACS Measure 261A)	<p>For the Lead Certification section, we are very pleased with the 20 day timeframe. We were a bit confused of why the two timeframes are called out in the footnote but as long as the Regional measure is the sum, as indicated, we accept the measure and appreciate the equal split of the processing time.</p> <p>For Pollution Prevention, we appreciate the clarification in the footnote and the change to Megawatt hours.</p>	<p>The Regional measure will count the sum of these two timeframes.</p> <p>Revisions incorporated into the document.</p>